



From the Desk of Almerinda Centore-Sitaras, Esq.  
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Bar Admissions: New York -Italy

June 26, 2025

**VIA ECF**

Hon. Judge Carol Bagley Amon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *MORGAN BURNS and ISMAEL DOMINGUEZ, on behalf of  
themselves and others vs. Nextra USA Corp. et al.***  
**1:25-cv-02688-CBA-MMH**

Dear Judge Amon:

We represent Defendants Nextra USA Corporation d/b/a Bacàn (“Nextra”), Massimo Cerrelli (“Massimo”), Valentina Rosticci (“Valentina”), and Alessio Di Giuseppe (“Alessio,” and together with Nextra, Massimo, and Valentina, the “Defendants”) in the above-referenced action.

We respectfully write to request that:

- 1) the Certificate of Default against Defendant Nextra dated June 24, 2025, be vacated; and
- 2) That Defendants be granted an extension of time to respond to the Complaint through and including **August 4, 2025**. Defendant Nextra’s current deadline to respond to the complaint was June 18, 2025, while the current deadline for Defendants Massimo, Valentina, and Alessio is July 15, 2025.

Plaintiffs have agreed and consented to the requests set forth above. Enclosed hereto as Exhibit 1 is a copy of the fully executed stipulation between the parties.

The extension is necessary as the individual Defendants reside in Italy, and additional time is required to coordinate representation and review the relevant documentation in order to prepare a response to the Complaint. There has been no previous request for an adjournment of this deadline.

cc: All Counsel (via ECF)

Respectfully submitted,  
  
Almerinda Centore Sitaras

# EXHIBIT “1”

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MORGAN BURNS and ISMAEL  
DOMINGUEZ, on behalf of themselves and  
others similarly situated,

Plaintiffs,

v.

NEXTRA USA CORPORATION d/b/a BACÀN,  
MASSIMO CERRELLI, VALENTINA  
ROSTICCI, and ALESSIO DI GIUSEPPE, in  
their individual and professional capacities,

Defendants.

Case No.: 1:25-cv-02688-CBA-MMH

**STIPULATION  
TO VACATE CERTIFICATE OF  
DEFAULT AND TO EXTEND  
DEFENDANTS' TIME TO  
RESPOND TO THE COMPLAINT**

**WHEREAS**, on May 13, 2025, Plaintiffs Morgan Burns and Ismael Dominguez (“Plaintiffs”), on behalf of themselves and others similarly situated, initiated this action against Defendants Nextra USA Corporation d/b/a Bacàn (“Nextra”), Massimo Cerrelli (“Massimo”), Valentina Rosticci (“Valentina”), and Alessio Di Giuseppe (“Alessio” collectively with Nextra, Massimo and Valentina “Defendants”), by filing a Complaint (*see* ECF No. 1);

**WHEREAS**, Defendant Nextra’s deadline to answer or otherwise move with respect to the Complaint was June 18, 2025;

**NOW, WHEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel, that:

- 1) Undersigned Counsel for Defendants hereby accepts service of the Complaint on behalf of all Defendants;
- 2) Plaintiffs consent to Defendants’ request to vacate any default currently entered against any Defendant in this action including, but not limited to, the Certificate of Default entered against Defendant Nextra on June 24, 2025; and

- 3) Defendants' deadline to answer, move, or otherwise respond to the Complaint shall be extended by 45 days from June 18, 2025 through and including August 4, 2025.

Dated: June 26, 2025  
New York, New York

**FARUQI & FARUQI, LLP**

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*Attorneys for Plaintiffs, the  
Proposed FLSA Collective, and  
the Proposed NYLL Class*

Dated: June 26, 2025  
New York, New York

**SITARAS & ASSOCIATES, PLLC**

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Almerinda Centore- Sitaras, Esq.

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*Attorneys for Defendants*